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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

12 Misc. 00115 (JSR)

Defendants.

In re MADOFF SECURITIES

PERTAINS TO THE FOLLOWING CASE:

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ACCESS MANAGEMENT LUXEMBOURG S.A.
(f/k/a ACCESS INTERNATIONAL ADVISORS
(LUXEMBOURG) S.A.), as represented by its
Liquidator FERNAND ENTRINGER, PIERRE
DELANDMETER, and PATRICK LITTAIE,

12 Civ. 05597 (JSR)

Adv. Pro. No. 12-01563 (BRL)

Defendants.

**DECLARATION OF DEBORAH H. RENNER IN OPPOSITION TO
DEFENDANTS' MOTION TO WITHDRAW THE REFERENCE**

DEBORAH H. RENNER hereby declares as follows:

1. I am a member of the Bar of this Court and a partner at the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, Trustee (the “Trustee”) for the substantively consolidated liquidation proceedings of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff (“Madoff”).

2. As an attorney of record, I am fully familiar with this case. I make this Declaration in support of the Trustee’s Opposition to the Motion to Withdraw the Reference (the “Motion”) filed by Access Management Luxembourg S.A. (“AML”) (as represented by its liquidator, Fernand Entringer), Pierre Delandmeter and Patrick Littaye (collectively, the “Third Party Plaintiffs”), to transmit to this Court true and correct copies of documents referred to in the Trustee’s opposition to the Motion, not otherwise provided to the Court by the Third Party Plaintiffs.

3. On or about June 19, 2012, counsel for the Third Party Plaintiffs advised counsel for the Trustee that Fernand Entringer is the only liquidator of AML. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Jack A. Gordon to Deborah H. Renner, dated June 19, 2012. Accordingly, on July 12, 2012, the Trustee Amended his Complaint in the above-referenced action, which now names only Fernand Entringer as AML’s Liquidator.

4. Attached hereto as Exhibit 2 is a true and correct copy of a letter, without attachments, from David J. Sheehan to Jay Shapiro and Robert Gottlieb, dated August 2, 2010, as originally annexed as Exhibit D to the Declaration of Gonzalo S. Zeballos in Support of the Trustee’s Application for Enforcement of Automatic Stay and Injunction against Patrick Littaye, Pierre Delandmeter and Access Management Luxembourg S.A., dated April 19, 2012 (the “Zeballos Declaration”).

5. Attached hereto as Exhibit 3 is a true and correct copy of a letter, without attachments, from Deborah H. Renner to Benoit Entringer, Laurence Payot, and Robert Gottlieb, dated March 29, 2012, as originally annexed as Exhibit E to the Zeballos Declaration.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Amended Complaint in *Picard v. UBS AG, et al.*, Adv. Proc. No. 08-01789 (BRL) and Case No. 11-cv-04212 (CM) (S.D.N.Y. August 17, 2011) [Dkt. 23].

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Date: New York, New York
August 1, 2012



Deborah H. Renner